

STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0103250
to discharge to waters of the State of Louisiana.
AI No.: 13484 / Activity No.: PER20090001

THE APPLICANT IS: Daily Equipment Company
P.O. Box 98209
Jackson, MS 39298

THE FACILITY IS: Daily Equipment Company
5450 Mounes Street
Harahan, Jefferson Parish

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Wascom

DATE PREPARED: May 5, 2009

1. PERMIT STATUS

- A. LPDES permit – LA0103250
LPDES permit effective date: July 26, 1996
LPDES permit expiration date: July 25, 2001
- B. LWDPDS permit – WP5353
LWDPDS permit effective date: July 26, 1996
LWDPDS permit expiration date: July 25, 2001
- C. Date Application Received: February 18, 2009

2. FACILITY INFORMATION

- A. FACILITY TYPE/ACTIVITY – Forklift rental and service facility

This is an existing forklift rental and service company. The facility steam cleans equipment and parts (e.g. engines and transmissions) before performing repairs. The washing is conducted in the back of the facility where the wash water and some storm water drains into an oil/water separator before it is discharged to the storm drain system. The sanitary wastewater from this facility is collected and treated by the local POTW.

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B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC codes: 7699 and 7359

C. LOCATION -

5450 Mounes Street
Harahan, Jefferson Parish
Latitude +29° 57' 23.6", Longitude -90° 11' 19.2"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: Equipment wash wastewater and storm water

Treatment: Oil/water separator

Location: at the point of discharge from the last catch basin prior to mixing with other waters

Flow: 360 GPD

Discharge Route: by pipe to the storm drain system, thence to Soniat Canal

NOTE: This facility does not require storm water permit coverage because it does not discharge regulated storm water. The facility's SIC codes, 7699 and 7359, are not listed in the storm water regulations at LAC 33:IX.2341.B.14.a-k and therefore the storm water runoff from the site is not classified as regulated industrial storm water.

Steam cleaning of engines is not an activity that is covered by the General Permit for Discharges of Exterior Vehicle Wash Wastewater LAG750000; therefore, an individual permit will be reissued to this facility.

4. RECEIVING WATERS

STREAM – Outfall 001 – by pipe to the storm drain system, thence to Soniat Canal

BASIN AND SEGMENT – Lake Pontchartrain – Subsegment 041302

DESIGNATED USES -

- a. Primary contact recreation
- b. Secondary contact recreation
- c. Propagation of fish and wildlife

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5. EXISTING EFFLUENT LIMITS

Outfall 001 – Equipment washwater and stormwater runoff

Parameter	Limitation Mo. Avg.: Daily Max.	Monitoring Frequency
Flow	Report: Report (GPD)	Quarterly
COD	200: 300 mg/L	Quarterly
Oil & Grease	---: 15 mg/L	Quarterly
TSS	---: 45 mg/L	Quarterly
pH	6.0 – 9.0 s.u.	Quarterly
Visual Sheen	---: No Presence	Daily

6. PROPOSED EFFLUENT LIMITS

BASIS – See rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There are no inspections on file since **January 1, 2006**. There are no open, appealed, or pending OES enforcement actions as of **May 5, 2009**. There is no EPA enforcement history on file as of **May 5, 2009**.

B. DMR Review/Excursions

A DMR review was performed for January 1, 2006 to March 31, 2009. The review of the 12 DMRs that were on file for this period revealed the following:

Reported Excursions

Date	Outfall	Parameter	Permit Limit	Reported
April – June 2007	001	TSS	45 mg/l	51
April – June 2006	001	TSS	45 mg/l	58
April – June 2006	001	COD	200 mg/l	291
April – June 2006	001	Oil & Grease	15 mg/l	19.5

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8. ENDANGERED SPECIES

The receiving waterbodies and proposed discharge are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. 303 (d) LISTED WATERBODIES

Subsegment 041302, Lake Pontchartrain Drainage Canals in Jefferson and Orleans Parishes is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators. To date no TMDLs have been completed for these waterbodies. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment, which are not directly attributed to the forklift rental and service point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. The discharge from this facility does not include sanitary wastewater, therefore; the discharge from this facility does not have the potential to contribute to the pathogen indicator impairments.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

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12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Daily Equipment Company

1. **Outfall 001 – Equipment wash wastewater and storm water**

Parameter	Limitation*	Reference
	Mo. Avg.: Daily Max.	
Flow	Report : Report (GPD)	LAC 33:IX.2361.1.1.b
COD	200: 300 mg/L	Similar discharges (BPJ)
Oil & Grease	---: 15 mg/L	Similar discharges (BPJ)
TSS	---: 45 mg/L	Similar discharges (BPJ)
pH	6.0 s.u. (min.) – 9.0 s.u. (max.)	Similar discharges (BPJ)
Oil & Grease, Visual	---: No Presence	Similar discharges (BPJ)

Treatment: Oil/water separator

Monitoring Frequency: Once per three months for all pollutants, with the exception of once per week for oil and grease, visual, at the point of discharge from the last catch basin prior to mixing with other waters. Soaps and/or Detergents: document in an inventory record the quantity and type of any Soap and/or Detergent used.

***Limits Justification:** For all parameters, limits and monitoring frequencies are based on similar discharges.

BPJ Best Professional Judgment
GPD Gallons per Day
s.u. Standard Units

NOTE:

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Monitoring Frequency

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrates two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.

Invoice No. _____

May 5, 2009

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LOUISIANA WATER POLLUTION CONTROL FEE SYSTEM
RATING WORKSHEET
PERMIT NO. LA0103250 AI NO. 13484

1. a. Company Name Daily Equipment Company
1. b. Facility Name Daily Equipment Company
2. Local Mailing Address P.O. Box 98209, Jackson, MS, 39298
3. Billing Address (If different) _____
4. a. Facility Location 5450 Mounes Street, Harahan
4. b. Parish Jefferson Parish
5. Facility Type Forklift rental and service facility
6. Products Produced _____
6. a. Raw materials stored or used _____
6. b. By-products produced _____
7. Primary SIC Code 7699 7. a. Other SIC Codes 7359
8. Fac. Manager Brad Tyra 8. a. Telephone (504) 733-4784
9. Owner Daily Equipment Company
9. a. Telephone (504) 733-4784
10. Env. Contact Tommy Dobbins 10. a. Telephone (601) 932-6011

11. State Permit No. <u>LA0103250</u>	12. NPDES Permit No. _____
11. a. Date Issued _____	12. a. Effective Date _____
11. b. New _____ Modified _____	12. b. Expiration Date _____

13. Number and Identification of Outfalls Outfall 001 – equipment wash wastewater and storm water
14. Number of Injection Wells _____
15. Water Source(s) city water
16. Receiving Water(s) by pipe to the storm drain system, thence to Soniat Canal
17. River Basin Lake Pontchartrain 18. Basin Segment No. 041302

Federal Tax I. D. No.: 64-0712071

TOTAL RATING POINTS ASSIGNED

0.00072

BFW Initials of Rater